

UNITED STATES OF AMERICA
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) CRIMINAL NO. 04-10358-GAO
v.)
)
DAVID BEAULIEU)
)
_____)

ASSENTED MOTION TO CONTINUE HEARING

With the assent of the government, The defendant, David Beaulieu, hereby moves this Honorable Court to continue the hearing presently scheduled for March 29, 2006, to a date on or after April 11, 2006, at the Court's convenience. This motion is filed with the assent of the government, and for the following reason:

1. A proposed plea agreement was first mailed to defense counsel on March 20, 2006. The parties have not yet reached agreement on the terms the government has proposed, and the defendant has not yet received the proposed agreement.

2. Additional time is necessary so that the defendant can review the proposed agreement with the advice of counsel, and also for the parties to see whether a final agreement can be reached.

WHEREFORE, the Defendant requests this Honorable Court to continue a final status conference for April 11, 2006 or

a date thereafter at the Court's convenience, with the understanding that if the parties are able to reach agreement then a Rule 11 hearing will be held on that date.

Respectfully submitted,

DAVID BEAULIEU
By his Attorney,

/s Leslie Feldman-Rumpler
Leslie Feldman-Rumpler, Esq.
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CERTIFICATE OF SERVICE

The undersigned, counsel for the defendant, hereby certifies that an electronic copy of the within document has been served on AUSA Paul Moore.

3/24/06
Date

/s/Leslie Feldman-Rumpler
Leslie Feldman-Rumpler, Esq.